



October 9, 2020

Alexandra Dunn
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Dunn:

I write to you regarding the agency's Safer Choice program and reports of an impending reorganization of the departments in which that program resides. By way of background, the National Retail Federation (NRF), the world's largest retail trade association, passionately advocates for the people, brands, policies, and ideas that help retail thrive. From its headquarters in Washington, D.C., NRF empowers the industry that powers the economy. Retail is the nation's largest private-sector employer, contributing \$3.9 trillion to annual GDP and supporting one in four U.S. jobs — 52 million working Americans. For over a century, NRF has been a voice for every retailer and every retail job, educating, inspiring, and communicating the powerful impact retail has on local communities and global economies.

Several of our member companies have contacted us to express concern that a reorganization of the Office of Chemical Safety and Pollution Prevention (OCSPP) will compromise the Safer Choice program and result in fewer staff and less resources dedicated to the program and its objectives. In recent years, many companies have come to rely on the program for help in identifying safer chemical alternatives to substances regulated under the Toxic Substances Control Act (TSCA). Furthermore, numerous retail companies have invested significant time and resources working to become EPA-recognized Safer Choice Retailers, a distinction which typically involves work to identify and offer to consumers a selection of products that are Safer Choice-certified. Some have even spent considerable resources to create and sell store-branded Safer Choice-certified products, and demand for these products continues to rise. The Safer Choice program has become an important part of many retailers' efforts on sustainability, which we expect will only continue to expand. We are concerned that the reorganization of the OCSPP, which follows a reassignment of program staff in recent years away from Safer Choice and toward implementation of the TSCA, will further diminish the Safer Choice program and lead it to wither on the vine.

Thank you for considering our views. Please do not hesitate to contact me or Scott Vinson on my staff at (202) 309-2204 if you have questions about the importance of the Safer Choice program to retail and our customers.

Sincerely,

A handwritten signature in black ink, appearing to read "David French", with a stylized flourish at the end.

David French
Senior Vice President
Government Relations